## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-20483-CR-ALMAN

UNITED STATES OF AMERICA,

Plaintiff,

VS.

SOMJEET CHRISTOPHER SINGH,

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## UNOPPOSSED MOTION TO CONTINUE TRIAL AND SCHEDULE A STATUS CONFERENCE

COMES NOW the Defendant, SOMJEET CHRISTOPHER SINGH, by and through his undersigned counsel and files this, his Unopposed Motion to Continue the Trial presently set for August 25th, 2025 and schedule a Status Conference, and in support thereof, the Defendant states the following:

- On July 10<sup>th</sup>, 2025, the Government filed a Superseding Indictment adding two (2) additional Defendants (Davindra Ramanan and Michael Jarrett) and charging Defendants Avin Seetaram, Somjeet Christopher Singh and Gavin Hunter with additional criminal offenses. (See D.E. #201);
- On July 17<sup>th</sup>, 2025, Defendant Michael Jarett was arraigned on the Superseding Indictment. (See D.E.#222);
- On July 22<sup>nd</sup>, 2025, Defendants Avin Seetram, Somjeet Christopher Singh, and Gavin Hunter were arraigned on the Superseding Indictment. (See D.E. #s 226, 229 and 2332);
- Defendant Davindra Ramanan is presently scheduled for Arraignment and Report regarding Counsel for Friday, August 15th, 2025;
- On August 7<sup>th</sup>, 2025, Defendant Avin Seetaram was severed and the Government announced that they wanted to try him first. (See D.E. #241);
- This Court, in granting the Motion to Sever Defendant Avin Seetaram, reset his trial to commence on September 30<sup>th</sup>, 2025. (See D.E. #236);

- Based on the added Defendants and additional charges, undersigned counsel will require additional time to prepare for trial;
- 8. Undersigned counsel conferred with attorney Marshall Dore Louis, who represents Defendant Gavin Hunter, and attorney Juan J Michelen, who represents Defendant Michael Jarrett, who join in this Motion to Continue the trial and each Defendant waives his right to a Speedy Trial;<sup>1</sup>
- That Assistant United States Attorney Abbie Waxman has represented that she does
  not oppose this requested continuance nor the scheduling of a Status Conference to
  address scheduling issues.

WHEREFORE, Defendants Somjeet Christopher Singh, Gavin Hunter, and Michael Jarrett request this Honorable Court continue their trial and set a Status Conference.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was electronically filed with the Clerk of Court using CM/ECF system which will send notice of electronic filing to all counsel of record this 13th day of August, 2025.

Respectfully submitted,

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BY: /S/ Stuart Adelstein STUART ADELSTEIN, ESQ. Fla Bar No. 234540

<sup>&</sup>lt;sup>1</sup> As of the writing of this Motion, Defendant Ramanan has yet to be arraigned on the Superseding Indictment.